

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF DELAWARE**

DRYWALL ACOUSTIC LATHING AND  
INSULATION LOCAL 675 PENSION FUND,  
Individually And On Behalf of All Others  
Similarly Situated,

Plaintiff,

V.

MOLSON COORS BREWING COMPANY,  
PETER H COORS, W LEO KIELY III,  
CHARLES M HERRINGTON, FRANKLIN W  
HOBBS, RANDALL OLIPHANT, PAMELA  
PATSY, WAYNE SANDERS, ALBERT C  
YATES, TIMOTHY V WOLF, PETER  
SWINBURN, DAVID G BARNES and PETER  
M R KENDALL,

## Defendants

CIVIL ACTION No. 1:05-CV-00294-KAJ

[Caption continues on next page]

**DEFENDANTS' RESPONSE TO MOTIONS FOR CONSOLIDATION AND FOR APPOINTMENT OF LEAD PLAINTIFF AND LEAD PLAINTIFF'S COUNSEL**

**WILLKIE FARR & GALLAGER LLP**

Michael R. Young  
Antonio Yanez, Jr.  
787 Seventh Avenue  
New York, NY 10019-6099  
(212) 728-8000

**RICHARDS, LAYTON & FINGER, P.A.**

Charles F Richards, Jr. (#701)  
Jeffrey L Moyer (#3309)  
John D. Hendershot (#4178)  
One Rodney Square, P O Box 551  
Wilmington, Delaware 19899-0551  
(302) 651-7700

### Counsel for Defendants

---

BRENT W KLOS, Individually And On Behalf  
of All Others Similarly Situated,

Plaintiff,

v

MOLSON COORS BREWING COMPANY,  
PETER H COORS, W LEO KIELY III,  
CHARLES M. HERRINGTON, FRANKLIN W  
HOBBS, RANDALL OLIPHANT, PAMELA  
PATSY, WAYNE SANDERS, ALBERT C  
YATES, TIMOTHY V WOLF, PETER  
SWINBURN, DAVID G BARNES and PETER  
M R KENDALL,

Defendants.

CIVIL ACTION No 1.05-CV-00317-KAJ

---

DAVID SILVER, Individually And On Behalf of  
All Others Similarly Situated,

Plaintiff,

v

MOLSON COORS BREWING COMPANY,  
PETER H COORS, W LEO KIELY III,  
CHARLES M. HERRINGTON, FRANKLIN W  
HOBBS, RANDALL OLIPHANT, PAMELA  
PATSY, WAYNE SANDERS, ALBERT C  
YATES, TIMOTHY V WOLF, PETER  
SWINBURN, DAVID G BARNES and PETER  
M R KENDALL,

Defendants.

CIVIL ACTION No 1.05-CV-00324-KAJ

**DEFENDANTS' RESPONSE TO MOTIONS FOR CONSOLIDATION AND FOR  
APPOINTMENT OF LEAD PLAINTIFF AND LEAD PLAINTIFF'S COUNSEL**

Defendants Molson Coors Brewing Company, Peter H. Coors, W. Leo Keily III, Charles M. Herington, Franklin W. Hobbs, Randall Oliphant, Pamela Patsley, Wayne Sanders, Albert C. Yates, Timothy V. Wolf, Peter Swinburn, David G. Barnes and Peter M.R. Kendall (collectively "Defendants") in the three above-captioned actions hereby respond to (1) the Motion of Plumbers and Pipefitters National Pension Fund for Consolidation, Appointment as Lead Plaintiff, and Approval of its Selection of Lead and Liaison Counsel (Dkt. No. 16), and (2) the Motion of the Molson Coors Investors Group for Consolidation, Appointment as Lead Plaintiff, and for Approval of Its Selection of Lead Counsel (Dkt. No. 19), as follows:

1. Defendants do not object to consolidation of the three above-captioned actions
2. Defendants take no position as between the competing motions for appointment as lead plaintiff and for approval of selection of lead counsel.

Of Counsel.  
Michael R. Young  
Antonio Yanez, Jr  
Willkie Farr & Gallagher LLP  
787 Seventh Avenue  
New York, NY 10019-6099  
(212) 728-8000

Dated: July 26, 2005

/s/ John D. Hendershot  
Charles F. Richards, Jr. (#701)  
*richards@rlf.com*  
Jeffrey L. Moyer (#3309)  
*moyer@rlf.com*  
John D. Hendershot (#4178)  
*hendershot@rlf.com*  
Richards, Layton & Finger, P.A.  
One Rodney Square, P.O. Box 551  
Wilmington, Delaware 19899-0551  
(302) 651-7700  
Attorneys for Defendants Molson Coors  
Brewing Company, Peter H. Coors, W.  
Leo Keily III, Charles M. Herington,  
Franklin W. Hobbs, Randall Oliphant,  
Pamela Patsley, Wayne Sanders, Albert  
C. Yates, Timothy V. Wolf, Peter  
Swinburn, David G. Barnes and Peter  
M.R. Kendall

**CERTIFICATE OF SERVICE**

I, John D Hendershot, hereby certify that on July 26, 2005, I electronically filed the foregoing "Defendants' Response to Motions for Consolidation and for Appointment of Lead Plaintiffs and Lead Plaintiffs' Counsel" with the Clerk of Court using CM/ECF, which will send notification of such filing(s) to the following:

Gary F Traynor  
Paul A Fioravanti, Jr.  
Prickett, Jones & Elliott, P.A.  
1310 N King Street  
Wilmington, DE 19801

Norman M. Monhait  
Carmella P Keener  
Rosenthal, Monhait, Gross & Goddess, P.A.  
919 North Market Street, Suite 1401  
Wilmington, DE 19801

Seth D. Rigrodsky  
Ralph N. Sianni  
Milberg Weiss Bershad & Schulman LLP  
919 North Market Street, Suite 411  
Wilmington, DE 19801

I further certify that on July 26, 2005, the foregoing document was sent to the following non-registered participants by First Class U S Mail.

Eric J Belfi  
Murray Frank & Sailer LLP  
275 Madison Avenue  
New York, NY 10016

Charles J. Piven  
Law Offices of Charles J. Piven, P.A.  
World Trade Center - Baltimore  
401 East Pratt Street, Suite 2525  
Baltimore, MD 21202

Stephen A. Weiss  
Eric T. Chaffin  
Seeger Weiss LLP  
One William Street  
New York, NY 10004

Michael Swick  
Law Offices of Michael A. Swick  
One William Street, Suite 555  
New York, NY 10004

**(List continues on next page)**

Marc A. Topaz  
Richard Maniskas  
Tamara Skvirsky  
Schiffirin & Barroway  
280 King of Prussia Road  
Radnor, PA 19087

Steven G. Schulman  
Peter E. Seidman  
Andrei V. Rado  
Sharon M. Lee  
Milberg Weiss Bershad & Schulman LLP  
One Pennsylvania Plaza, 49th Floor  
New York, NY 10119

William S. Lerach  
Darren J. Robbins  
Lerach Coughlin Stoia Geller  
Rudman & Robbins LLP  
401 B Street, Suite 1600  
San Diego, CA 92101

Elise J. Cohen  
Lerach Coughlin Stoia Geller  
Rudman & Robbins LLP  
9601 Wilshire Boulevard, Suite 510  
Los Angeles, CA 90210

/s/ John D. Hendershot  
John D. Hendershot (#4178)  
*hendershot@rlf.com*